

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE: : BANKRUPTCY NO. 22-10007-JCM
:
MICHAEL EUGENE MOSS & :
SUZANNE MARIE MOSS, :
Debtors : HONORABLE JOHN C. MELARAGNO
:
:
SN SERVICING CORPORATION, AS : CHAPTER 13
SERVICER FOR US BANK TRUST, NA, AS :
TRUSTEE OF LB-IGLOO SERIES VI : RELATED TO CLAIM NO. 5
TRUST, :
Movant, :
:
V. :
:

MICHAEL EUGENE MOSS, SUZANNE
MARIE MOSS AND RONDA J.
WINNECOUR, CHAPTER 13 TRUSTEE,
Respondents.

DECLARATION REGARDING NOTICE OF POST-PETITION MORTGAGE FEES, EXPENSES &
CHARGES FILED IN COMPLIANCE WITH THE LOCAL RULES

I hereby certify as counsel for the Debtors that the existing Chapter 13 Plan is adequately funded
and that there is no need to file an amended Chapter 13 Plan.

Respectfully submitted,

THE QUINN LAW FIRM

BY: /s/ Michael S. Jan Janin
Michael S. Jan Janin, Esquire
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**CERTIFICATE OF SERVICE OF DECLARATION REGARDING
NOTICE OF POST-PETITION MORTGAGE FEES, EXPENSES & CHARGES**

I certify under penalty of perjury that I served the above captioned pleading on the parties at the addresses specified below or on the attached list on June 18, 2025.

The type of service made on the parties was: Electronic Notification via the CM/ECF System

- Office of the United States Trustee at ustpreion03.pi.ecf@usdoj.gov
- Ronda J. Winnecour at cmecf@chapter13trusteedpa.com
- Brent J. Lemon on behalf of Creditor Limosa LLC at blemon@kmlawgroup.com,
lemondropper75@hotmail.com
- Lauren Moyer on behalf of Creditor SN Servicing Corporation as servicer for U.S. Bank Trust National Association, as Trustee of LB-Igloo Series VI Trust at bkecf@friedmanvartolo.com,
bankruptcy@friedmanvartolo.com

EXECUTED ON June 18, 2025

Respectfully submitted,
THE QUINN LAW FIRM

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